

FILED IN CLERK'S OFFICE
U.S.D.C. Atlanta

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

NOV 08 2023

ATLANTA DIVISION

KEVIN P. WEIMER, Clerk
By: *Rebecca V. Eicher* Deputy Clerk

DONNA CURLING et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

CIVIL ACTION NO.
1:17-cv-2989-AT

MOTION TO INTERVENE

Not being an attorney, proposed Plaintiff-Intervenor apologizes for any form deficiencies in this filing. In an attempt to preserve a personal right to cast a meaningful ballot, as well as preserve the same right for those similarly situated, now comes the proposed Plaintiff-Intervenor and states the following:

A. Proposed Plaintiff-Intervenor Should Be Granted Intervention as a Matter of Right. (a) Intervention of right. Upon timely application anyone shall be permitted to intervene in an action: (1) When a statute confers an unconditional right to intervene; or (2) When the applicant claims an interest relating to the property or transaction which is the subject matter of the action and he is so situated that the disposition of the action may as a practical matter impair or impede his ability to protect that interest, unless the applicant's interest is adequately represented by existing parties. a party is allowed to intervene as a matter of right if it can be shown that: (1) the application for intervention is timely; (2) the applicant claims an interest that is a subject of the action; (3) the disposition of the action

Per Phone

Don't bind so they
can scam

No filing fee
existing case

Return Copy in
separate envelope

Filer
Copy

may impair the applicant's ability to protect that interest; and (4) the interest may not be adequately represented by existing parties. Proposed intervenor has studied the election process from 2020 until current in depth. Dissallowing intervention would prevent proposed intervenor from protecting their right to vote. Proposed Plaintiff-Intervenor satisfies each of these requirements.

B. 1. This motion is timely. A motion to intervene is considered timely "unless it would work a hardship on one of the original parties." The timeliness requirement is liberally construed. This action has been pending for years and is yet in a state of incompleteness considering the October 2020 ruling. Granting intervention to Proposed Plaintiff-Intervenor would not work a hardship on the original parties. This motion is timely.

2. Proposed Plaintiff-Intervenor has an interest that is a subject of this action: the full and continued implementation and enforcement of state and federal laws and rights regarding the right to cast a meaningful ballot.

3. Disposition of this action will impair Proposed Plaintiff Intervenor's ability to protect their interests. Proposed Plaintiff-Intervenors also meet the requirement, for intervention as a matter of right, that the disposition of the action may as a practical matter impair or impede his ability to protect that interest.

4. Proposed Plaintiff-Intervenor's interests are not adequately represented by plaintiffs who have not familiarized with the risks that would prevent the right to cast a meaningful ballot by the utilization of Dominion Imagecast equipment and system.

C.. Proposed Plaintiff Intervenor Also Meets the Requirements for Permissive Intervention. Permissive intervention should be granted if: (1) the motion to intervene is timely; (2) the intervenor's claim or defense has a question of law or fact in common with the main action; and (3) the intervention will not cause undue delay or prejudice. Proposed Plaintiff-Intervenors have satisfied these requirements.

1. The motion to intervene is timely.

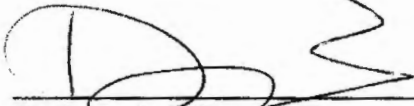
2. Proposed Plaintiff-Intervenors' claim has a question of law or fact in common with the main action.

3. The motion to intervene will not cause undue delay or prejudice.

For the reasons set forth above, Proposed Plaintiff-Intervenor respectfully requests that this Court grant their motion to intervene in this action.

DATED this 7th day of November, _____

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Deborah J. Davis', written over a horizontal line.

Deborah J Davis, Pro se

200 Morris Hill Rd.

Canton, GA. 30114

770-720-8349

davis980519@gmail.com

The Court has ruled: "Risks are posed both by a sudden shift to a statewide hand-marked paper system and proceeding with the BMD system. Ultimately, the Court must find that imposition of such a sweeping change in the State's primary legally adopted method for conducting elections at this moment in the electoral cycle would fly in the face of binding appellate authority and the

State's strong interest in ensuring an orderly and manageable administration of the current election, consistent with state law. So, for this reason **alone**, despite the strength of the Plaintiff's evidence, the Court must decline the Plaintiffs' Motions for Preliminary Injunction." As we are not now on the cusp of an election so near, with the lone reason for not granting injunctive relief in 2020 removed, there is no longer any impediment to granting the relief intervenor seeks.

Georgia law requires emergency paper ballots be available for use in an emergency. The quantity of such ballots would only need to be increased for use and spoilage with arrangements made for counting, possibly a second poll shift of trained volunteers to replace tired pollworkers for the counting. O.C.G.A. 21-2-437 details the procedure for counting hand marked ballots at the precinct. There are on-demand printers that are capable of printing ballots to be hand marked at the precinct mimicing the ballot a voter would receive by using the voter card in the Dominion system. Such printers were recently mentioned in State Election Board complaints as being available.

When I early voted Oct. 14, 2020, the long line was explained as being due to an earlier bandwidth problem. I do not know if the bandwidth problem was due to internet connectivity or perhaps unauthorized access in the system. I filed a complaint to question the problem Nov. 11, 2020, and as of this time have had no response. The Dominion contract with Georgia, page 98, [Exhibit A] required \$1.5 million cyber insurance per cyber incident. I recently made an open records request for the records of such cyber incidents and was advised they do not maintain a record of such incidents. With the Dominion contract requiring cyber insurance, internet connectivity has to be presumed.

Expert Philip Stark, a former member of the Election Assistance Commission, has sued the EAC for meeting with election equipment manufacturers and secretly granting permission for internet connectivity. Philip B. Stark and Free Speech For the People v. United States Election Assistance Commission, United States District Court for the District of Columbia.

In the 2022 primary when I worked the scanner while working a poll, almost every voter complained about having to vote on the current system. As a pollworker I was not allowed to engage with voters but took note of their statements. Using the current system is tantamount to electronic vote harvesting and can result in voters not knowing how their right to vote is executed beyond their own hands. Using a system which discourages voting is a form of voter suppression as voting in the current system is little more than letting a vote be carried by the wind however it may land.

Any audit utilizing the printed ballots associated with the current Dominion system would depend on all voters verifying the printed ballot properly records their vote. While there are signs posted in the poll area and poll workers sporadically remind voters to check their ballots, in my observance in poll watching and poll working the reality is that most voters do not check their printed ballot, rendering the printed ballots more a ruse than a legitimate paper trail. As voters can not read the QR code in which the vote is imbedded for tabulation and thus on which elections are decided and the great difficulty questioning elections has presented, being able to verify the vote by the voter is mandatory and unquestionable.

I have trained as a poll worker and poll watcher. I worked the primary May 24, 2022 and watched several polls in the advance voting, general election, and runoff. I have studied Dominion, attended events for information and familiarized myself with election law and cases. I normally attend my county Board of Elections meetings, attend what I can online and have attended court hearings. I have attended logic and accuracy testing as well as monitored audits. I have queried my county election staff to their aggravation. When the poll closed in the general election in 2022 I continued to observe the poll closing and followed the ballots from my personal precinct to the central office.

Secretary Raffensperger knew of the ruling issued by the court in this case and the Halderman Report since 2020. In the intervening time he has done nothing to address the deficiencies named in either. In fact mitigation is reported to be impossible on this system pursuant to the Halderman Report. Another ruling in this case dated September 17, 2018, details the problems and expert evaluations as well as a history of the vulnerabilities presented by this system. Two years before 2020 and three years after 2020 is plenty of time for election problems to have been resolved somehow if in fact trustworthy elections is the goal. The fact that elections problems have not been resolved amplifies the the need for the Court to act to grant requested relief.

Whenever I worked and watched polls I was always in awe of those who came at great personal trouble often physically assisted often using medical devices and even oxygen to cast their vote. Those who would diminish these or any votes by cast or count have earned my greatest disdain.

In trying to figure the best way to vote in 2022, I did have to run a gauntlet. There were risks with each choice and at various points in each choice. I thought the best way to vote was to vote absentee, but that would not address fraudulent votes or adjudication.

Having made a good study of the current voting landscape and believing that I have as much duty as anyone else to protect my own vote as best I can, it is now unlikely that any voter can rely on casting and having their vote counted properly in the current system. Therefore, I am no longer able to cast a viable, secure vote in the current system.

Georgia law, O.C.G.A. 21-2-379.22 (8), requires that for a bmd to be used in an election, it must correctly and accurately mark every vote cast. The previous ruling that a voter is unable to read the QR code in which the vote to be counted is embedded prevents a voter from being able to determine that the bmd has accurately recorded the vote to be counted. Once scanned no link to the voter removes any means of verifying the accuracy.

Only lawful, registered voters are allowed to cast a lawful vote. Any means by which votes are manipulated by the system, not the least of which in Dominion is adjudication, allows the system to vote and the system is not a lawfully registered voter. While I hate not to vote or advise others of the existing voting minefield, the Dominion system as well as no response to complaints and dismissal of questioning lawsuits renders it my duty.

The right to vote is the fundamental right upon which the republic rests. *Duncan v. Poythress*, 515 F Supp. (N.D. Ga. 1981) April 28, 1981, "No right is more precious in a free country than that of having a voice in the election of those who make the laws under which, as good citizens, we must live. Other rights, even the most basic are illusory if the right to vote is undermined." "The right to vote freely for the candidate of one's choice is of the essence of a democratic society, and any restrictions on that right strike at the heart of representative government...." *Reynolds v. Sims* (1964) 377 US 533.

"Undeniably the Constitution of the United States protects the right of all qualified citizens to vote, in state as well as in federal elections." *Reynolds v. Sims*, *supra*. Qualified citizens not only have a constitutionally protected right to vote, *Exparte Yarbrough*, 110 U.S. 651, 45 S. Ct. 152 (1884), but also the right to have their votes counted, *United States v. Mosley*, 238 U.S. 383, 35 S.Ct. 904, a right which can neither be denied outright, *Lane v. Wilson* 307 U.S. 268, nor destroyed by alteration of ballots, *United States v. Classic*, 313 U.S. 299 61 S.Ct. 1031, (1941) nor destroyed by ballot box stuffing, *United States v. Saylor*, 322 U.S. 385, 64 S. Ct. 1101. (1944). The reason for such constitutional protection is clear."

Presuming the requirement for cyber insurance in the Dominion contract indicates possible internet access, and the fact that the Halderman Report advises patches will not secure the Dominion system, the result is the deprivation of the most basic rights of Georgia citizens. Given the time in which action could have been taken to restore a fair election process and the fact that security patches which will not secure the system, Georgians can glean that the result is not elections that comply with law while preserving the rights of the citizenry.

As the system patches will not secure the system and that citizens of Georgia would still be subject to the violations of Georgia code previously noted, I seek injunctive relief to prohibit the use of Dominion ICX BMD and related software and equipment in any county in Georgia. Emergency paper ballots following the counting procedure at the precincts is the most cost effective solution to the current violative system. Therefore, the above is my prayer and request for relief. Though we are not as close to an election as in 2020, time is of the essence in granting the requested relief for appropriate preparation.

Dated this 2nd day of November 2023
Respectfully submitted,

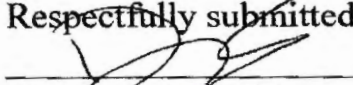

Deborah J. Davis, pro se
200 Morris Hill Rd. Canton, GA 30114
770 720 8349
davis980519@gmail.com

Exhibit A

Master Solution Purchase and Services Agreement

termination of the Agreement shall be provided; or such coverage must be maintained in effect for ten (10) years following the date of expiration or termination of the Agreement. The retroactive date shall not precede the (signature) date of the Agreement.

- 1.5 Commercial Fidelity and Crime Insurance - Coverage with a limit of not less than \$1,000,000 per occurrence, including coverage for or the benefit of State in the event of loss of money, securities or property third party legal liability, or fraud arising out of or in connection with the acts or omissions of Contractor Personnel in an amount not less than \$1 Million per loss.
- 1.6 Cyber-Liability Insurance - Coverage \$1,500,000 per occurrence covering liability for transmission of a virus, hacker damage, theft or unauthorized disclosure of private information, theft of digital ID, cyber business interruption, cyber extortion, and consumer and client coverage.
- 1.7 Excess or Umbrella Liability Insurance - Coverage on a follow-form basis, with a minimum limit of \$5,000,000 per occurrence and \$5,000,000 as an annual aggregate, in excess of the following insurance coverages described above: Worker's Compensation Insurance and Employer's Liability Insurance coverage; Commercial General Liability Insurance; and Automobile Liability Insurance coverage.

Deborah J. Davis

Attorney

Party

Dara Lindenbaum
Sandler Reiff Lamb Rosenstein &
Birkenstock, P.C.
Suite 750
1090 Vermont Avenue, NW
Washington, DC 20005

Abrams For Governor
Care In Action
Ebenezer Baptist Church of Atlanta, Inc.
Fair Fight Action, Inc.
Sixth Episcopal District, Inc.
Virginia-Highland Church, Inc.
Baconton Missionary Baptist Church

David R. Lowman
Fulton County Attorney's Office
141 Pryor Street, SW
Suite 4038
Atlanta, GA 30303

Richard Barron
David Burge
Vernetta Nuriddid
Kathleen D. Ruth
Fulton County Board of Registrations &
Elections
Mark Wingate
Mary Carole Cooney
Aaron Johnson

Hannah Rose Elson
Morrison & Foerster, LLP - DC
2100 L Street, NW
Washington, DC 20037

Coalition For Good Governance
Ricardo Davis
Laura Digges
William Digges, III
Megan Misset
Donna Price
Rockdale County Board of Elections & Regis.
Jeffrey Schoenberg
Donna Curling

Edward Bedard
Robbins Alloy Belinfante Littlefield LLC
500 14th Street, N.W.
Atlanta, GA 30318

William S. Duffey, Jr.
Sara Tindall Ghazal
Tildall Ghazal
Janice W. Johnston
Edward Lindsey

Matthew Mashburn
Brad Raffensperger

Joshua Barrett Belinfante
Robbins Ross Alloy Belinfante
Littlefield LLC
500 14th Street, N.W.
Atlanta, GA 30318

Seth Harp
The State Election Board
David Worley
Rebecca N. Sullivan

Agnes Bridges
Fayette County Board of Elections and
Voter Registration
140 Stonewall Avenue West
Suite 208
Fayetteville, GA 30214

Agnes Bridges

Nicholas Andrew Kinsley
Hall Booth Smith Tifton
1564 King Road
Tifton, GA 31793

Coffee County Board of Elections

F. Skip Sugarman
Sugarman Law LLP
154 Krog Street NE
Suite 190
Atlanta, GA 30307

Common Cause

Alan Jay Butler
Alan Butler
1519 New Hampshire Avenue NW
Washington, DC 20036

Electronic Privacy Information Center

Elizabeth Ahern Monyak
Cobb County Attorney's Office
Suite 350
100 Cherokee Street
Marietta, GA 30090

Janine Eveler

Attorney not clear
Leaving copy with court clerk

Fortalice Solutions, Inc.

Pierce Groover Blitch, IV
Fleming & Nelson, LLP
P.O. Box 2208
Suite 201

Hancock County Board of Elections

James Jayson Phillips
Talley Richardson & Cable, P.A.
P.O. Box 197
367 West Memorial Drive
Dallas, GA 30132

Deidre Holden
Joseph Kirk

Attorney not clear
leaving copy with clerk of court

Milton Kidd

Robert David Cheeley
Cheeley Law Group, LLC
Suite 200
2500 Old Milton Parkway
Alpharetta, GA 30009

Cathleen Alston Latham

Richard John Capriola
Winter Capriola Zenner, LLC
One Ameris Center
3490 Piedmont Road NE
Suite 800
Atlanta, GA 30305

Paul Maggio

Jonathan Lee Schwartz
Law Office of Jon L. Schwartz
1100 Peachtree St. NE
Ste 250
Atlanta, GA 30309

National Election Defense Coalition

Kenneth Paul Robin
Jarrard & Davis, LLP
222 Webb St.
Cumming, GA 30040

Ameika Pitts

Melanie Felicia Wilson
Gwinnett County Department of Law
75 Langley Dr.
Lawrenceville, GA 30046-6935

Kristi L. Royston

Anna Nicole Edmondson
Robbins Alloy Belinfante Littlefield
LLC
500 14th Street, N.W.
Atlanta, GA 30318

Ralph F. (Rusty) Simpson

Joseph Matthew Maguire, Jr.
Parks Chesin & Walbert, P.C. -Atl
75 14th St. NE
26th Floor
Suite 2600
Atlanta, GA 30309

U.S. Dominion, Inc.

Kate Talmor
DOJ-Civ
1100 L Street NW
Washington, DC 20005

U.S. CISA

Angela White-Davis
Newton County Board of Elections and
Registration
1113 Usher St NW #103
Covington, GA 30014

Angela White-Davis

The DOUGLAS COUNTY BOARD OF
ELECTIONS AND REGISTRATION
no attorney given leaving copy with
clerk of court

If not necessary
in motion to intervene
in existing case
1:17-cv-2989-AT
please discontinue

JS44 (Rev. 10/2020 NDGA)

CIVIL COVER SHEET

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)

Multiple existing case
Civil action No. 1:17-CV-2989AT

(b) COUNTY OF RESIDENCE OF FIRST LISTED
PLAINTIFF Multiple
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANT(S)

Multiple existing case

COUNTY OF RESIDENCE OF FIRST LISTED
DEFENDANT Multiple
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Multiple

ATTORNEYS (IF KNOWN)

Multiple

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. GOVERNMENT PLAINTIFF
☐ 2 U.S. GOVERNMENT DEFENDANT
☐ 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)
☐ 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(FOR DIVERSITY CASES ONLY)

- | PLF | DEF | PLF | DEF |
|----------------------------|----------------------------|----------------------------|---|
| <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| | | | INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| | | | INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
| | | | FOREIGN NATION |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 ORIGINAL PROCEEDING
☐ 2 REMOVED FROM STATE COURT
☐ 3 REMANDED FROM APPELLATE COURT
☐ 4 REINSTATED OR REOPENED
☐ 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District)
☐ 6 MULTIDISTRICT LITIGATION - TRANSFER
☐ 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT
☐ 8 MULTIDISTRICT LITIGATION - DIRECT FILE

motion to intervene

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

motion to intervene

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|---|---|
| <input checked="" type="checkbox"/> 1. Unusually large number of parties. | <input type="checkbox"/> 6. Problems locating or preserving evidence |
| <input type="checkbox"/> 2. Unusually large number of claims or defenses. | <input type="checkbox"/> 7. Pending parallel investigations or actions by government. |
| <input type="checkbox"/> 3. Factual issues are exceptionally complex | <input type="checkbox"/> 8. Multiple use of experts. |
| <input type="checkbox"/> 4. Greater than normal volume of evidence. | <input type="checkbox"/> 9. Need for discovery outside United States boundaries. |
| <input type="checkbox"/> 5. Extended discovery period is needed. | <input type="checkbox"/> 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT \$ _____ APPLYING IFP _____ MAG. JUDGE (IFP) _____
JUDGE _____ MAG. JUDGE _____ NATURE OF SUIT _____ CAUSE OF ACTION _____
(Referral)

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)**CONTRACT - "0" MONTHS DISCOVERY TRACK**

- ☐ 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- ☐ 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- ☐ 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- ☐ 110 INSURANCE
- ☐ 120 MARINE
- ☐ 130 MILLER ACT
- ☐ 140 NEGOTIABLE INSTRUMENT
- ☐ 151 MEDICARE ACT
- ☐ 160 STOCKHOLDERS' SUITS
- ☐ 190 OTHER CONTRACT
- ☐ 195 CONTRACT PRODUCT LIABILITY
- ☐ 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 210 LAND CONDEMNATION
- ☐ 220 FORECLOSURE
- ☐ 230 RENT LEASE & EJECTMENT
- ☐ 240 TORTS TO LAND
- ☐ 245 TORT PRODUCT LIABILITY
- ☐ 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- ☐ 310 AIRPLANE
- ☐ 315 AIRPLANE PRODUCT LIABILITY
- ☐ 320 ASSAULT, LIBEL & SLANDER
- ☐ 330 FEDERAL EMPLOYERS' LIABILITY
- ☐ 340 MARINE
- ☐ 345 MARINE PRODUCT LIABILITY
- ☐ 350 MOTOR VEHICLE
- ☐ 355 MOTOR VEHICLE PRODUCT LIABILITY
- ☐ 360 OTHER PERSONAL INJURY
- ☐ 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- ☐ 365 PERSONAL INJURY - PRODUCT LIABILITY
- ☐ 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- ☐ 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 370 OTHER FRAUD
- ☐ 371 TRUTH IN LENDING
- ☐ 380 OTHER PERSONAL PROPERTY DAMAGE
- ☐ 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- ☐ 422 APPEAL 28 USC 158
- ☐ 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☒ 440 OTHER CIVIL RIGHTS
- ☐ 441 VOTING
- ☐ 442 EMPLOYMENT
- ☐ 443 HOUSING/ ACCOMMODATIONS
- ☐ 445 AMERICANS WITH DISABILITIES - Employment
- ☐ 446 AMERICANS WITH DISABILITIES - Other
- ☐ 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- ☐ 462 NATURALIZATION APPLICATION
- ☐ 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- ☐ 463 HABEAS CORPUS- Alien Detainee
- ☐ 510 MOTIONS TO VACATE SENTENCE
- ☐ 530 HABEAS CORPUS
- ☐ 535 HABEAS CORPUS DEATH PENALTY
- ☐ 540 MANDAMUS & OTHER
- ☐ 550 CIVIL RIGHTS - Filed Pro se
- ☐ 555 PRISON CONDITION(S) - Filed Pro se
- ☐ 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- ☐ 550 CIVIL RIGHTS - Filed by Counsel
- ☐ 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- ☐ 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- ☐ 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- ☐ 710 FAIR LABOR STANDARDS ACT
- ☐ 720 LABOR/MGMT. RELATIONS
- ☐ 740 RAILWAY LABOR ACT
- ☐ 751 FAMILY and MEDICAL LEAVE ACT
- ☐ 790 OTHER LABOR LITIGATION
- ☐ 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 820 COPYRIGHTS
- ☐ 840 TRADEMARK
- ☐ 880 DEFEND TRADE SECRETS ACT OF 2016 (DTSA)

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- ☐ 830 PATENT
- ☐ 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- ☐ 861 HIA (1395d)
- ☐ 862 BLACK LUNG (923)
- ☐ 863 DIWC (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSID TITLE XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- ☐ 870 TAXES (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- ☐ 375 FALSE CLAIMS ACT
- ☐ 376 Qui Tam 31 USC 3729(a)
- ☐ 400 STATE REAPPORTIONMENT
- ☐ 430 BANKS AND BANKING
- ☐ 450 COMMERCE/CC RATES/ETC.
- ☐ 460 DEPORTATION
- ☐ 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- ☐ 480 CONSUMER CREDIT
- ☐ 485 TELEPHONE CONSUMER PROTECTION ACT
- ☐ 490 CABLE/SATELLITE TV
- ☐ 890 OTHER STATUTORY ACTIONS
- ☐ 891 AGRICULTURAL ACTS
- ☐ 893 ENVIRONMENTAL MATTERS
- ☐ 895 FREEDOM OF INFORMATION ACT 899
- ☐ 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- ☐ 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- ☐ 410 ANTI-TRUST
- ☐ 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ☐ 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT: *injunctive relief*

☐ CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND ☐ YES ☐ NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE *Tobias*

DOCKET NO. *1:17-CV-2989 AT*

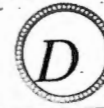
CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- ☐ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- ☐ 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- ☐ 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

SIGNATURE OF ATTORNEY OF RECORD

DATE



Deborah J. Davis
200 Morris Hill Rd
Canton, GA 30114-4017

NOV 08 2023
U.S. Marshals Service
Atlanta, GA

CL
Ri
Ur
22
75
At